## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOANNA WILSON, as Independent Administrator of the Estate of Areon J. Marion, Deceased

Plaintiff,

VS.

COOK COUNTY, ILLINOIS, et al.,

Defendants.

Case No.: 22-cv-6886

Honorable Andrea R. Wood

## PARTIES JOINT STATUS REPORT

Plaintiff, Joanna Wilson, and Defendants, COOK COUNTY, ILLINOIS, COOK COUNTY SHERIFF'S OFFICE, Yaser Haq, Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin, and Officer B. Vargas, by their respective attorneys, hereby submit the following joint status report:

- 1. The Current Status of Discovery:
  - a. The parties have exchanged Rule 26(a)(1) disclosures, along with accompanying documents. On March 21, 2023, Plaintiff issued discovery requests on all defendants. In the process of litigating the case, counsel for Cook County Defendants uncovered a possible conflict in representing two individuals: Nikki Ruffin and Steve Paschos. The two defendants were subsequently appointed to outside counsel. Counsel for Nikki Ruffin filed an appearance. Counsel for Steve Paschos is in the process of reviewing the case and filing an appearance. As a result of the additional time needed for review and appointment of outside counsel, as well as the extent of Plaintiff's lengthy discovery requests, Defendants requested additional time to respond to Plaintiff's discovery requests. Plaintiff

agreed to an extension to May 22, 2023. On May 8, 2023, the Sheriff's Office and Officer Vargas issued discovery requests to Plaintiff.

- b. At this time, the parties are not aware of any disputes that will require the Court's involvement and expect to complete discovery by January 31, 2024.
- Defendant Bednarz has been served and filed an answer to Plaintiff's First Amended Complaint.
- 3. Defendants received a settlement demand from Plaintiff on April 12, 2023. Defendants are in the process of reviewing the case to determine whether a settlement conference would be fruitful.
- 4. The parties do not believe that a telephonic status hearing is required at this time.

Respectfully Submitted,

## KIMBERLY M. FOXX

State's Attorney of Cook County

By: /s/ Mia Buntic

Mia Buntic
Assistant State's Attorney
500 Richard J. Daley Center, Suite 2760
Chicago IL 60602
(312)603-1434
Mia.buntic@cookcountyil.gov
On behalf of COOK COUNTY

## KIMBERLY M. FOXX

State's Attorney of Cook County

By:/s/ Antonio Lee

Antonio Lee Assistant State's Attorneys 500 Richard J. Daley Center Chicago, Illinois 60602 (312)603-5439

Antonio.Lee@cookcountyil.gov

On behalf of SHERIFF's Office and Officer Vargas

s/ James Pullos

James C. Pullos 120 N. LaSalle Street Suite 3600 Chicago, IL 60602 Phone: 312-899-9090 jcp@cliffordlaw.com

On behalf of **Plaintiff** 

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2023, I electronically filed the foregoing document with the Clerk of the Court for Northern District of Illinois, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of E-Filing" to the attorneys of record in this case.

/s/ Mia Buntic Mia Buntic